

**REDACTED – FOR PUBLIC INSPECTION**

**VIA ECFS**

June 26, 2015

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: **REQUEST FOR CONFIDENTIAL TREATMENT**  
**WC Docket No. 14-58 - ETC Annual Reports and Certifications**

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 14-58, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Delcambre Telephone Company, LLC (“Delcambre” or “the Company”), Study Area Code 270428 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress report is being made pursuant to Section 0.459 of the Commission’s rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC’s June 17, 2015 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that Delcambre

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Ms. Marlene Dortch

Page 2

maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

**Five-Year Service Quality Improvement Plan Progress Report**

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Delcambre requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Company's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Company's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Company's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Company does not make publicly available.

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Ms. Marlene Dortch

Page 3

- (4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to “cherry pick” the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Company’s access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

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Ms. Marlene Dortch

Page 4

The Company requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Company's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

- (9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

### **Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Delcambre seeks confidential treatment of its financial annual report pursuant to the June 17, 2015 *Protective Order* in WC Docket No. 10-90, *et al.*<sup>1</sup> The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Delcambre is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, 14-58, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

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<sup>1</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 (rel. June 17, 2015).

**MOSS-ADAMS** LLP

Ms. Marlene Dortch  
Page 5

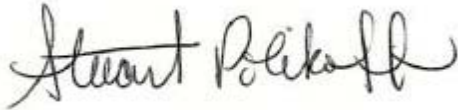
Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Polikoff". The signature is fluid and cursive, with the first name "Stuart" and last name "Polikoff" clearly distinguishable.

Stuart Polikoff  
Authorized Representative for  
Delcambre Telephone Company, LLC

SP/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Ms. Marcy Landry, Delcambre Telephone Company, LLC

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

|  |                       |
|--|-----------------------|
| <010> Study Area Code  | 270428                |
| <015> Study Area Name  | DELCAMBRE TEL CO      |
| <020> Program Year   | 2016                  |
| <030> Contact Name: Person USAC should contact with questions about this data      | Marcy Landry          |
| <035> Contact Telephone Number: Number of the person identified in data line <030> | 3376852311 ext.       |
| <039> Contact Email Address: Email of the person identified in data line <030>     | mlandry@delcambre.net |

| ANNUAL REPORTING FOR ALL CARRIERS  |  | 54.313<br>Completion<br>Required    | 54.422<br>Completion<br>Required    |
|--|--|-------------------------------------|-------------------------------------|
|  |  | (check box when complete)           |                                     |
| <100> Service Quality Improvement Reporting  | (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <200> Outage Reporting (voice)   | (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> <input type="text"/> <-- check box if no outages to report   |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <300> Unfulfilled Service Requests (voice) <input type="text"/> 0  |  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <310> Detail on Attempts (voice)   | <div style="border: 1px solid black; height: 40px; width: 100%;"></div><br>(attach descriptive document) | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <320> Unfulfilled Service Requests (broadband) <input type="text"/> 0  |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <330> Detail on Attempts (broadband)   | <div style="border: 1px solid black; height: 40px; width: 100%;"></div><br>(attach descriptive document) | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <400> Number of Complaints per 1,000 customers (voice)   |  |                                     |                                     |
| <410> Fixed  | <input type="text"/> 0.0   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> Mobile   | <input type="text"/> 0.0   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <430> Number of Complaints per 1,000 customers (broadband)   |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <440> Fixed  | <input type="text"/> 0.0   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <450> Mobile   | <input type="text"/> 0.0   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <500> Service Quality Standards & Consumer Protection Rules Compliance   | (check to indicate certification)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> <div style="border: 1px solid black; padding: 2px;">2704281a510.pdf</div>  | (attached descriptive document)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> Functionality in Emergency Situations  | (check to indicate certification)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> <div style="border: 1px solid black; padding: 2px;">2704281a610.pdf</div>  | (attached descriptive document)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> Company Price Offerings (voice)  | (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <710> Company Price Offerings (broadband)  | (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <800> Operating Companies and Affiliates   | (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>                                    | (if yes, complete attached worksheet)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1000> Voice Services Rate Comparability Certification   | <input type="text"/> Yes   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1010> <div style="border: 1px solid black; padding: 2px;">2704281a1010.pdf</div>  | (attach descriptive document)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> | (if not, check to indicate certification)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1110>   | (complete attached worksheet)  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1200> Terms and Condition for Lifeline Customers  | (complete attached worksheet)  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

|        |                                   |                          |                          |
|--------|-----------------------------------|--------------------------|--------------------------|
| <2000> | (check to indicate certification) | <input type="checkbox"/> | <input type="checkbox"/> |
| <2005> | (complete attached worksheet)     | <input type="checkbox"/> | <input type="checkbox"/> |

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

|        |                                   |                                     |                          |
|--------|-----------------------------------|-------------------------------------|--------------------------|
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <3005> | (complete attached worksheet)     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |  |   |
|-------|--|---|
| <010> | Study Area Code  | 270428  |
| <015> | Study Area Name  | DELCAMBRE TEL CO  |
| <020> | Program Year   | 2016  |
| <030> | Contact Name - Person USAC should contact regarding this data  | Marcy Landry  |
| <035> | Contact Telephone Number - Number of person identified in data line <030>  | 3376852311 ext.   |
| <039> | Contact Email Address - Email Address of person identified in data line <030>  | mlandry@delcambre.net   |
| <110> | Has your company received its ETC certification from the FCC?<br>If your answer to Line <110> is yes, do you have an existing "5<br>year plan" filed with the FCC? | <input checked="" type="radio"/> (yes / no) <input type="radio"/><br>(yes / no) <input type="radio"/> |
| <111> |  |   |

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

2704281a112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

|       |  |                |
|-------|--|----------------|
| <113> | Maps detailing progress towards meeting plan targets   | Yes            |
| <114> | Report how much universal service (USF) support was received   | Yes            |
| <115> | How much (USF) was used to improve service quality and how support was used to improve service quality   | Yes            |
| <116> | How much (USF) was used to improve service coverage and how support was used to improve service coverage | Yes            |
| <117> | How much (USF) was used to improve service capacity and how support was used to improve service capacity | Yes            |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year.                | Not Applicable |







(800) Operating Companies  
Data Collection Form  
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                                  |
|-------|---|----------------------------------|
| <010> | Study Area Code   | 270428                           |
| <015> | Study Area Name   | DELCAMBRE TEL CO                 |
| <020> | Program Year  | 2016                             |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry                     |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.                  |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | milandry@delcambre.net           |
| <810> | Reporting Carrier   | Delcambre Telephone Company, LLC |
| <811> | Holding Company   | Not Applicable                   |
| <812> | Operating Company   | Delcambre Telephone Company, LLC |

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |

|       |                                    |
|-------|------------------------------------|
| <910> | Tribal Land(s) on which ETC Serves |
|-------|------------------------------------|

|       |   |
|-------|---|
| <920> | Tribal Government Engagement Obligation |
|-------|---|

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select<br>Yes or No or<br>Not Applicable |
|--|
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |

|   |  |   |  |
|---|--|---|--|
| <b>(1100) No Terrestrial Backhaul Reporting</b> |  | FCC Form 481  |  |
| <b>Data Collection Form</b>                     |  | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |  |
|   |  | July 2013   |  |

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers

Lifeline Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |

|        |  |                             |                           |
|--------|--|-----------------------------|---------------------------|
| <1210> | Terms & Conditions of Voice Telephony Lifeline Plans | <div>2704281a1210.pdf</div> | Name of Attached Document |
| <1220> | Link to Public Website                               | HTTP                        |                           |

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

|        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMERE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Wacey Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376652311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcamere.net |

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>

2nd Year Certification {47 CFR § 54.313(b)(1)i}

<2011a>

3rd Year Certification {47 CFR § 54.313(b)(1)ii}

<2011b>

Attachment {47 CFR § 54.313(b)(1)ii}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012>

2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}

<2013>

2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}

<2014>

2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}

<2015>

2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016>

Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017>

3rd year Broadband Service Certification

<2018>

5th year Broadband Service Certification

<2019>

Interim Progress Certification

<2020>

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document(s) Listing Required Information

<2021> Interim Progress Community Anchor Institutions

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marvey Landry         |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mLandry@delcambre.net |

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

2704281a3010.pdf

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☒

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

2704281a3012.pdf

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

☒

(3014)

If yes, does your company file the RUS annual report

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

2704281a3026.pdf

Name of Attached Document Listing Required Information

(3018)

If the response is no on line 3014, Is your company audited?

☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021)

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☒

(3023)

Underlying information subjected to a review by an independent certified public accountant

☒

(3024)

Underlying information subjected to an officer certification.

☒

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3026)

Attach the worksheet listing required information

2704281a3026.pdf

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

Data Collection Form

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |



- Financial Data Summary**
- (3027) Revenue
  - (3028) Operating Expenses
  - (3029) Net Income
  - (3030) Telephone Plant In Service(TPIS)
  - (3031) Total Assets
  - (3032) Total Debt
  - (3033) Total Equity
  - (3034) Dividends

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

|       |   |                       |
|-------|---|-----------------------|
| <010> | Study Area Code   | 270428                |
| <015> | Study Area Name   | DELCAMBRE TEL CO      |
| <020> | Program Year  | 2016                  |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients  |                                |
|---|--------------------------------|
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. |                                |
| Name of Reporting Carrier:  |                                |
| Signature of Authorized Officer:  | Date                           |
| Printed name of Authorized Officer:   |                                |
| Title or position of Authorized Officer:  |                                |
| Telephone number of Authorized Officer:   |                                |
| Study Area Code of Reporting Carrier:   | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.  |                                |

|   |  |
|---|--|
| <b>Certification - Agent / Carrier<br/>Data Collection Form</b> | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|--|

|   |                       |
|---|-----------------------|
| <010> Study Area Code   | 270428                |
| <015> Study Area Name   | DELCAMBRE TEL CO      |
| <020> Program Year  | 2016                  |
| <030> Contact Name - Person USAC should contact regarding this data                 | Marcy Landry          |
| <035> Contact Telephone Number - Number of person identified in data line <030>     | 3376852311 ext.       |
| <039> Contact Email Address - Email Address of person identified in data line <030> | mlandry@delcambre.net |

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier   |  |
|---|--|
| I certify that (Name of Agent) <u>Stuart Polikoff</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. |  |
| Name of Authorized Agent:   | <u>Stuart Polikoff</u>   |
| Name of Reporting Carrier:  | <u>DELCAMBRE TEL CO</u>  |
| Signature of Authorized Officer:  | <u>CERTIFIED ONLINE</u> Date: <u>06/26/2015</u>                |
| Printed name of Authorized Officer:   | <u>Sybil Benoit</u>  |
| Title or position of Authorized Officer:  | <u>Billing Manager</u>   |
| Telephone number of Authorized Officer:   | <u>3376852311 ext.</u>   |
| Study Area Code of Reporting Carrier:   | <u>270428</u> Filing Due Date for this form: <u>07/01/2015</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.  |  |

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier   |  |
|--|--|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. |  |
| Name of Reporting Carrier:   | <u>DELCAMBRE TEL CO</u>  |
| Name of Authorized Agent or Employee of Agent:   | <u>Stuart Polikoff</u>   |
| Signature of Authorized Agent or Employee of Agent:  | <u>CERTIFIED ONLINE</u> Date: <u>06/26/2015</u>                |
| Printed name of Authorized Agent or Employee of Agent:   | <u>Stuart Polikoff</u>   |
| Title or position of Authorized Agent or Employee of Agent:  | <u>Telecommunications Consulting Director</u>                  |
| Telephone number of Authorized Agent or Employee of Agent:   | <u>5126527730 ext.</u>   |
| Study Area Code of Reporting Carrier:  | <u>270428</u> Filing Due Date for this form: <u>07/01/2015</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.   |  |

## Attachments

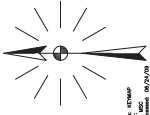




**LINE 112 – FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN  
PROGRESS REPORT**

Delcambre Telephone Company, LLC (“the Company”) received \$64,532 in Universal Service Fund (“USF”) support during the period January through April 2015. It projects that it will receive \$32,266 in USF support during the period May – June 2015. The Company therefore projects that its total USF support for the first half of 2015 (Jan.-Jun.) will be \$96,798.



[illegible]

|                               |   |
|-------------------------------|---|
| EXCHANGE:<br><b>DELCAMBRE</b> | PROJECT NO:   |
| DATE DRAWN:<br><b>5/09</b>    | FILE NAME:<br><b>KEYMAP</b>   |
| SCALE:<br><b>1" = 2500'</b>   | PREPARED BY:<br><b>BB CONSULTANTS</b><br>NORTH, UTAH (435) 623-1052 |
| PLAT NUMBER:<br><b>1 OF 1</b> |   |

## **LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE**

Delcambre Telephone Company, LLC (“the Company”) complies with applicable service quality standards and consumer protection rules for its voice and broadband services.

The rates, terms, and conditions under which the Company operates are outlined in its local exchange tariff, which is approved by the Louisiana Public Service Commission (“Louisiana PSC”). The tariff contains provisions regarding the Company’s customer service and protection practices.

Service quality standards for voice service are established by the Louisiana PSC. The Company consistently meets or exceeds those standards and provides reports to the Louisiana PSC, in accordance with the Louisiana PSC’s rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a “best effort” service and are dependent upon a number of variables, many of which are outside the control of the Company.

The Company complies with any and all consumer protection obligations under state law.

The Company also complies with the following consumer best practices: (1) the Company discloses its rates and terms of service to customers; (2) the Company provides specific disclosures in its advertising; (3) the Company separately identifies carrier charges from taxes on its billing statements; (4) the Company provides ready access to customer service; (5) the Company promptly responds to consumer inquiries and complaints received from government agencies; and (6) the Company abides by policies for protection of consumer privacy.

Finally, the Company has a policy and established operating procedures that comply with the FCC’s Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company’s compliance with CPNI rules and a description of the Company’s operating procedures that ensure compliance are filed annually with the FCC.

## **LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

Delcambre Telephone Company, LLC (“the Company”) is capable of operating in emergency situations. Standby power generators are supplied at the central office, repeater sites, and video headend to ensure functionality without external power until such power is restored.

The Company is capable of repairing or replacing damaged facilities which it owns. These facilities include copper and fiber cable, utility poles, as well as network routers needed for the recovery of services. The Company is dependent upon AT&T for the rerouting of traffic around damaged facilities, as AT&T owns the facilities in the Company’s central office that carry toll and Internet traffic. Although recovery may not be immediate after an emergency, there is a restoration plan in place for an expeditious recovery of services when the emergency has passed and it is safe for the needed repairs to be completed.

## **LINE 1010 – VOICE SERVICES RATE COMPARABILITY**

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$47.48, which includes the federal subscriber line charge ("SLC").<sup>1</sup>

The single-line residential local rate for all residential customers served by Delcambre Telephone Company, LLC ("the Company") is \$13.03. When the federal SLC (\$6.50) and the state SLC (\$1.00) are included, the rate becomes \$20.53. Therefore, the Company's pricing of fixed voice services is less than the reasonable comparability benchmark of \$47.48.

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<sup>1</sup> *Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes*, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

## **LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS**

Residential customers of Delcambre Telephone Company, LLC (“the Company”) who qualify for the Lifeline Program receive a discount of \$9.25 on local voice telephony service.

For all of the Company’s Lifeline customers, the Lifeline single-line residential rate, including the federal subscriber line charge (“SLC”) and the state SLC, is \$11.28 (\$20.53 standard rate - \$9.25 discount).

All single-line residential customers, including Lifeline customers, have an unlimited number of minutes for calls made within the local calling area.

Lifeline customers may purchase Local Optional Service (“LOS”) for a non-discounted rate of \$.97 plus \$.06/minute capped at \$15.00. LOS is a calling plan that encompasses areas within 40 miles of the Company’s local exchange area. Once a customer’s calls reach \$15, they will not be billed for any other calls within the 40 mile area. If usage is below the capped rate, the customer only pays for the calls made.

Lifeline customers may subscribe to long distance service offered by the Company at a non-discounted rate of \$.13/minute. Lifeline customers may also choose another long distance carrier. Lifeline customers may also elect to subscribe to toll blocking at no charge.

The Company offers bundled services to Lifeline customers that are discounted by \$9.25 for the voice component of the bundle.

Lifeline Program reductions do not apply to additional services such as information-related services and custom calling features. Lifeline customers may subscribe to these services at the same rates offered to other customers.

Additional information regarding the terms and conditions of voice telephony Lifeline plans can be found at [http://www.delcambre.net/telephone\\_life\\_line.html](http://www.delcambre.net/telephone_life_line.html).

**LINE 3010 – MILESTONE CERTIFICATION**

Delcambre Telephone Company, LLC (“the Company”) hereby certifies that the Company has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

**LINE 3012 – COMMUNITY ANCHOR INSTITUTIONS**

Delcambre Telephone Company, LLC did not newly deploy broadband service to any community anchor institutions in the preceding calendar year (2014).

**DELCAMBRE TELEPHONE CO., L.L.C.**

**FINANCIAL REPORT**

**DECEMBER 31, 2014**

## CONTENTS

|  | Page  |
|--|-------|
| INDEPENDENT ACCOUNTANTS' REVIEW REPORT | 1     |
| FINANCIAL STATEMENTS                   |       |
| Balance sheets                         | 2     |
| Statements of income                   | 3     |
| Statements of members' equity          | 4     |
| Statements of cash flows               | 5     |
| Notes to financial statements          | 6 - 9 |

INDEPENDENT ACCOUNTANTS' REVIEW REPORT

To the Board of Directors  
Delcambre Telephone Co., L.L.C.  
Delcambre, Louisiana

We have reviewed the accompanying balances sheets of Delcambre Telephone Co., L.L.C. as of December 31, 2014 and 2013 and the related statements of income, members' equity, and cash flows for the years then ended. A review includes primarily applying analytical procedures to management's financial data and making inquiries of Company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements as a whole. Accordingly, we do not express such an opinion.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the reviews in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. Those standards require us to perform procedures to obtain limited assurance that there are no material modifications that should be made to the financial statements. We believe that the results of our procedures provide a reasonable basis for our report.

Based on our reviews, with the exception of the matter described in the following paragraph, we are not aware of any material modifications that should be made to the accompanying financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

As disclosed in Note 1 to the financial statements, accounting principles generally accepted in the United States of America would require the Company to consolidate its financial statements with its wholly owned subsidiary, Delcambre Cellular, L.L.C. The Company's management has informed us that the Company is reporting the investment in its subsidiary using the cost method of accounting.

Lafayette, Louisiana  
June 23, 2015

DELCAMBRE TELEPHONE COMPANY, L.L.C.

BALANCE SHEETS  
December 31, 2014 and 2013

| ASSETS  | <u>2014</u> | <u>2013</u> |
|---|-------------|-------------|
| CURRENT ASSETS                                      |             |             |
| Cash and cash equivalents                           |             |             |
| Certificate of deposit                              |             |             |
| Accounts receivable                                 |             |             |
| Inventory   |             |             |
| Prepaid insurance                                   |             |             |
| Other current assets                                |             |             |
| Total current asset                                 |             |             |
| INVESTMENTS   |             |             |
| PROPERTY AND EQUIPMENT                              |             |             |
| Land  |             |             |
| Depreciable assets, net of accumulated depreciation |             |             |
| Total property and equipment                        |             |             |
| Total assets  |             |             |
| LIABILITIES AND MEMBERS' EQUITY                     |             |             |
| CURRENT LIABILITIES                                 |             |             |
| Accounts payable                                    |             |             |
| Accrued expenses                                    |             |             |
| Total current liabilities                           |             |             |
| OTHER LIABILITIES                                   |             |             |
| Due to related parties                              |             |             |
| Total liabilities                                   |             |             |
| MEMBERS' EQUITY                                     |             |             |
| Total liabilities and members' equity               |             |             |

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF INCOME  
Years Ended December 31, 2014 and 2013

|                                    | <u>2014</u> | <u>2013</u> |
|------------------------------------|-------------|-------------|
| Income:                            |             |             |
| Local network services             |             |             |
| Long distance network services     |             |             |
| Other regulated revenue            |             |             |
| Non-regulated revenue              |             |             |
| Total operating revenues           |             |             |
| Operating expenses:                |             |             |
| Plant specific expense             |             |             |
| Plant nonspecific expense          |             |             |
| Depreciation                       |             |             |
| Customer operation expense         |             |             |
| Corporate operation expense        |             |             |
| Total operating expenses           |             |             |
| Operating loss                     |             |             |
| Other income (expenses):           |             |             |
| Interest income                    |             |             |
| Bad debt                           |             |             |
| Total other income (expenses), net |             |             |
| Net loss                           |             |             |

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF MEMBERS' EQUITY  
Years Ended December 31, 2014 and 2013

|                            | <u>2014</u>   | <u>2013</u> |
|----------------------------|---|-------------|
| Members' equity, beginning |  |             |
| Net loss                   |   |             |
| Members' equity, ending    |   |             |

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE COMPANY, L.L.C.

STATEMENTS OF CASH FLOWS  
Years Ended December 31, 2014 and 2013

|   | <u>2014</u> | <u>2013</u> |
|---|-------------|-------------|
| <b>CASH FLOWS FROM OPERATING ACTIVITIES</b>                                     |             |             |
| Net loss  |             |             |
| Adjustments to reconcile net loss to net cash provided by operating activities: |             |             |
| Depreciation  |             |             |
| (Increase) decrease in current assets –   |             |             |
| Accounts receivable   |             |             |
| Inventory   |             |             |
| Prepaid expenses  |             |             |
| Other current assets  |             |             |
| Increase (decrease) in current liabilities –                                    |             |             |
| Accounts payable  |             |             |
| Accrued expenses  |             |             |
| Net cash provided by operating activities                                       |             |             |
| <b>CASH FLOWS FROM INVESTING ACTIVITIES</b>                                     |             |             |
| Payments for the purchase of property and equipment                             |             |             |
| Redemption of certificate of deposit  |             |             |
| Purchase of certificate of deposit  |             |             |
| Net cash used in investing activities   |             |             |
| <b>CASH FLOWS FROM FINANCING ACTIVITIES</b>                                     |             |             |
| Advances from related parties   |             |             |
| Net cash provided by financing activities                                       |             |             |
| Net increase in cash and cash equivalents                                       |             |             |
| Cash and cash equivalents at beginning of year                                  |             |             |
| Cash and cash equivalents at end of year  |             |             |

See Accompanying Notes and Independent Accountants' Review Report.

DELCAMBRE TELEPHONE CO., L.L.C.

NOTES TO FINANCIAL STATEMENTS  
See Independent Accountants' Review Report

Note 1. Accounting Policies

[REDACTED]

Nature of operations:

[REDACTED]

Basis of accounting:

[REDACTED]

Use of estimates:

[REDACTED]

Cash and cash equivalents:

[REDACTED]

Receivables:

[REDACTED]

Property and depreciation:

[REDACTED]

NOTES TO FINANCIAL STATEMENTS

Income taxes:



Accounting for wholly owned subsidiaries:



Note 2. Investments



NOTES TO FINANCIAL STATEMENTS

Note 3. Property, Equipment and Depreciation



Note 4. Concentration of Credit Risk



Note 5. Related Parties



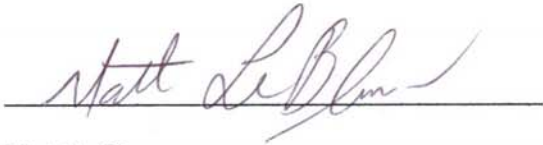
NOTES TO FINANCIAL STATEMENTS

Note 6. Subsequent Events



**OFFICER CERTIFICATION**  
**pursuant to**  
**47 C.F.R. §54.313(f)(2)**

I, Matt LeBlanc, President of Delcambre Telephone Company, LLC, hereby certify that Delcambre Telephone Company was (a) not audited in the ordinary course of business for fiscal year 2014, and (b) that the reported data are accurate.

A handwritten signature in cursive script, appearing to read "Matt LeBlanc", is written over a horizontal line.

Matt LeBlanc  
President  
Delcambre Telephone Company, LLC  
Study Area Code 270428  
(337) 685-2311